

Exhibit D

Brian J. Flynn, M.D.

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 CHARLESTON DIVISION

4 Case No.: 2:13-cv-04457 MDL NO. 2326

5
6 VIDEO DEPOSITION OF BRIAN J. FLYNN, MD August 29, 2014
7

8 BOSTON SCIENTIFIC CORPORATION, PELVIC REPAIR SYSTEM PRODUCTS
9 LIABILITY LITIGATION
10 Related to
11 AMBER COMER.
12

13
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25

1 reconstructive surgery.

2 I started out as an assistant professor and was
3 promoted to associate professor at my eighth year. And I'm
4 being considered for full professor.

5 My practice is largely in female pelvic medicine,
6 but I do male reconstructive surgery as well.

7 Q. Okay. And correct me if I'm wrong. My
8 understanding is that you receive a lot of referrals when
9 other physicians around the region have mesh complications.
10 Is that accurate?

11 A. I receive a lot of referrals for a variety of
12 complaints, mesh complications included.

13 Q. Would you say that you see more mesh complications
14 than most gynecologists or urogynecologists in this area?

15 MR. MYERS: Objection to form.

16 A. I see a lot of complications. I'm not familiar
17 with what other people's numbers are. But I know I'm very
18 busy in that part of my practice. It's a significant part of
19 my practice. I've done -- I have an interest in that area.

20 (BY MR. McCRARY) Q. Have you ever done any
21 research involving pelvic mesh?

22 A. Can you be more specific about research?

23 Q. Have you ever performed any studies involving
24 pelvic mesh?

25 A. Clinical studies in terms of prospective randomized

1 studies or industry sponsored studies, no. In terms of
2 retrospective case series, yes, looking at my own experiences
3 with mesh.

4 I've looked at my experience using TVT Secur is
5 one product that I've written about. And I've published
6 videos on TVT Abbrevio. I have published a video on Prolift
7 is another product that I've published a video on.

8 And with respect to mesh complications, I've
9 written about that. I've written two major articles. One
10 was an update for the American Urologic Association. And
11 another article was a recent article in 2013 I believe in the
12 International Urogynecology looking at complications from
13 midurethral slings.

14 Most of my research is retrospective case series.
15 It's not bench work. I've never done any laboratory work or
16 bench science, or any kind of biomaterial scientific research
17 on any of these products.

18 Q. So does that then mean that you're essentially
19 going back and looking at the cases that you've seen, and
20 quantifying how often you see certain occurrences with pelvic
21 mesh? Is that accurate?

22 A. Yes, that's accurate.

23 Q. Okay. And you mentioned that you did a video.
24 What were you, what was the purpose of the video? Was it
25 a training video?

1 A. A few purposes. One is as a faculty member here
2 we're encouraged to present our data and do research and
3 interact at scientific meetings, and so the videos were part
4 of a scientific program that was presented at the American
5 Urologic Association.

6 One of the videos, one was presented at the south
7 central section of the American Urologic Association. Those
8 videos were done with our residents and fellows.

9 So the videos were done to present our technique,
10 and to help guide physicians on how to do the procedure
11 properly. That is the majority of the videos.

12 There is one video that was done specifically for
13 Ethicon. That was the TVT Abbrevio video. That is on their
14 website. That's my video; it's still on the website today.

15 And that video was done for online training as part
16 of their physician portal. It's not viewable by consumers,
17 but just for, for physicians who have a portal. They can go
18 online and look at the video.

19 And it was shared at their different teaching
20 courses they have.

21 Q. So I take it, then, that you have been retained to
22 work for -- is it, did you say Johnson and Johnson? Or was
23 it --

24 A. I had been during that time, yes.

25 Q. And it was Johnson and Johnson?